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***Lead Counsel for the Indirect  
Purchaser Plaintiffs for the 22 States***

**UNITED STATES DISTRICT COURT  
NORTHERN DISTRICT OF CALIFORNIA  
OAKLAND DIVISION**

## **IN RE: CATHODE RAY TUBE (CRT) ANTITRUST LITIGATION**

Case No. 4:07-cv-5944-JST  
MDL No. 1917

**THIS DOCUMENT RELATES TO:**

# INDIRECT PURCHASER ACTIONS FOR THE 22 STATES

**REQUEST FOR PERMISSION TO FILE  
DECLARATION OF CLAIMS  
ADMINISTRATOR IN SUPPORT OF  
INDIRECT PURCHASER PLAINTIFFS'  
OPPOSITION TO OBJECTIONS TO  
AMENDED SETTLEMENTS**

1 Pursuant to Civil L.R. 7-3(d), the Indirect Purchaser Plaintiffs (“IPPs”) respectfully  
2 request permission to file the attached Declaration of Joseph M. Fisher, Re: Claims By Objectors  
3 in support of IPPs’ opposition to the objections to the amended settlements and attorneys’ fee  
4 request.

5 At the hearing on IPPs’ motion for final approval of the amended settlements on July 8,  
6 2020, the Court indicated that it would overrule the objections to the settlements on standing  
7 grounds and that the Court’s ruling would be contained in a detailed Order. We have reviewed  
8 the record on the standing issues and while it is implicitly conceded by the Objectors in their  
9 papers that they have not filed claims in this matter, it is not expressly conceded. Nor was it  
10 expressly conceded at the hearing.

11 Attached hereto is the Declaration of Joseph M. Fisher, which establishes that none of  
12 the objectors has filed a claim. IPPs respectfully request that this Declaration be filed in this  
13 matter. This will eliminate any ambiguity and ensure the best possible record in support of the  
14 Court’s anticipated ruling.

15 Respectfully submitted,

16 Dated: July 10, 2020

17 By: /s/ Mario N. Alioto  
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# **EXHIBIT 1**

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***Class Counsel for the  
Indirect Purchaser Plaintiffs***

**UNITED STATES DISTRICT COURT  
NORTHERN DISTRICT OF CALIFORNIA  
OAKLAND DIVISION**

**IN RE: CATHODE RAY TUBE (CRT)  
ANTITRUST LITIGATION**

MASTER FILE NO. 4:07-cv-5944-JST  
Case No.: 4:13-cv-03234-JST

This Document Relates to:

MDL NO. 1917

## INDIRECT PURCHASER ACTIONS FOR THE 22 STATES

**DECLARATION OF JOSEPH M. FISHER  
RE: CLAIMS BY OBJECTORS**

Hearing Date: July 8, 2020  
Time: 2:00 p.m.  
Courtroom: 6, 2<sup>nd</sup> Fl. (Oakland)  
Judge: Hon. Jon S. Tigar

1 I, Joseph M. Fisher, declare:

2 **INTRODUCTION**

3       1. Identification. I am the president of The Notice Company, Inc., a Massachusetts  
4 corporation with offices at 94 Station Street, Hingham, MA 02043 (“The Notice Company” or  
5 “Settlement Administrator”). The Notice Company is principally engaged in the administration of  
6 class action settlements and lawsuits pending in courts around the United States, including the  
7 dissemination of notice to class members, administering the claims process, and distributing the  
8 proceeds of the litigation to the class. I have over 15 years of experience assisting attorneys with class  
9 action notices and claims administration. I am also a member in good standing of the bars of the  
10 Commonwealth of Massachusetts, the District of Columbia, and the Commonwealth of Virginia. I  
11 am over 21 years of age and not a party to this action. I have personal knowledge of the facts set forth  
12 herein and, if called as a witness, could and would testify thereto under oath.

13       2. Settlements. The Notice Company has served as the Settlement Administrator for the  
14 cathode ray tube (“CRT”) indirect-purchaser plaintiffs (“IPP”) settlements with Chunghwa Picture  
15 Tubes, Ltd; the LG Electronics defendants (LG Electronics, Inc., LG Electronics U.S.A., Inc., and LG  
16 Electronics Taiwan Taipei Co., Ltd); the Philips defendants (Koninklijke Philips N. V. (f/k/a  
17 Koninklijke Philips Electronics N. V.); Philips Electronics North America Corporation; Philips  
18 Taiwan Limited (f/k/a Philips Electronics Industries (Taiwan), Ltd.); and Philips do Brasil, Ltda. (f/k/a  
19 Philips da Amazonia Industria Electronica Ltda.)); the Panasonic defendants (Panasonic Corporation  
20 (f/k/a Matsushita Electric Industrial Co., Ltd.); Panasonic Corporation of North America; MT Picture  
21 Display Co., Ltd.; and an affiliate of Panasonic Corporation, Beijing Matsushita Color CRT Co., Ltd.);  
22 the Hitachi defendants (Hitachi, Ltd.; Hitachi Displays, Ltd. (n/k/a Japan Display Inc.); Hitachi  
23 Electronic Devices (USA), Inc.; Hitachi Asia, Ltd.; and Hitachi America, Ltd.); the Toshiba  
24 defendants (Toshiba Corporation; Toshiba America Information Systems, Inc.; Toshiba America  
25 Consumer Products, L.L.C.; and Toshiba America Electronic Components, Inc.); the Samsung SDI  
26 defendants (Samsung SDI Co. Ltd; Samsung SDI America, Inc.; Samsung SDI Brasil, Ltda.; Tianjin  
27 Samsung SDI Co., Ltd.; Shenzhen Samsung SDI Co., Ltd; Samsung SDI Malaysia Sdn. Bhd; and  
28 Samsung SDI Mexico S.A. de C. V.); the Thomson defendants (Technicolor SA (f/k/a Thomson SA)

and Technicolor USA, Inc. (f/k/a Thomson Consumer Electronics, Inc.); and Technologies Displays Americas LLC (f/k/a Thomson Americas LLC). These settlements are collectively referred to as the “Settlements.”

3. Review of purported objectors to Settlements. Class Counsel has requested that I review objections purportedly made on behalf of the following persons:

- a) “Other Repealer State” objectors identified as Tyler Ayres, Mike Bratcher, Nikki Crawley, Jay Erickson, Harry Garavanian, John Heenan, Hope Hitchcock, D. Bruce Johnson, Jeff Johnson, Kerry Murphy, Chris Seufert, Robert Stephenson, Gary Talewsky, and William Trentham. ECF No. 5732.
  - b) “Non Repealer State” objector identified as Eleanor Lewis. ECF No. 5732.
  - c) “22 State Amended Settlement Class” objectors identified as Craig A. Schuler, Valerie G. Deick, Gloria A. Comeaux, Lisa L. Butterbrodt, Dale B. McKenzie, Eric R. Coggins, Heather J. Gordon, Dennis S. Cornett, David N. Watson, Brendan C. McCann, Jessica M. McIntyre, Wes M. Woods, Sarah McClure Woods, Miguel A. Albarran, Mary J. Baucom, Jeff Speaect, Kirby Allen Thornton, and Alicia Schnieder. ECF Nos. 5739-5752, 5755, 5766-1, 5766-2.

4. No claims made by purported objectors to Settlements. I reviewed the purported objections listed in paragraph 3 above. I have also reviewed the records maintained by The Notice Company of claims that class members have submitted to receive proceeds from the Settlements. According to these records, none of the individuals listed in paragraph 3 above have submitted a claim as indirect purchasers of CRT products.

I declare under penalty of perjury that the foregoing is true and correct to the best of my knowledge.

Executed at Hingham, Massachusetts, this 10<sup>th</sup> day of July, 2020.

JOSEPH M. FISHER